UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

-----x

In re:

: Case No. 13-53846 (SWR)

CITY OF DETROIT, MICHIGAN, : Chapter 9

Hon. Steven W. Rhodes

Debtor. :

-----x

STIPULATION FOR ENTRY OF AN ORDER CONCERNING THE DEADLINE FOR OAKLAND COUNTY, MICHIGAN TO SERVE COPIES OF CERTAIN REBUTTAL EXPERT REPORTS

NOW COMES the City of Detroit and Oakland County, Michigan ("Oakland County"), by and through the undersigned counsel, and hereby stipulate to entry of an Order Concerning the Deadline for Oakland County, Michigan to Serve Copies of Certain Rebuttal Expert Reports in the form of Exhibit A hereto.

WHEREAS, the Court entered the Fifth Amended Order Establishing the Procedures, Deadlines and Hearing Dates Relating to the Debtor's Plan of Adjustment [Docket No. 5259] (the "Fifth Amended Scheduling Order") on June 9, 2014. The Fifth Amended Scheduling Order establishes certain dates for objecting creditors to file a list of expert witnesses and serve copies of rebuttal expert reports.

WHEREAS, in connection with the deposition of Alan Perry, the City's pension expert, the parties agree as follows:

1. The deposition of Mr. Perry will take place on July 25, 2014.

- 2. The deadline for reports from Oakland County's experts that address pensions shall be extended to **July 29, 2014**.
- 3. Except as otherwise extended by separate order of the Court, the deadline for all other rebuttal expert reports and disclosure of expert witnesses remains July 25, 2014, in accordance with the Fifth Amended Scheduling Order.

Dated: July 25, 2014 Respectfully Submitted,

/s/ Robert S. Hertzberg

Robert S. Hertzberg (P30261) PEPPER HAMILTON LLP 4000 Town Center, Suite 1800 Southfield, MI 48075-1505 Telephone: (248) 359-7333 Facsimile: (248) 359-7700

and

hertzbergr@pepperlaw.com

Miguel Eaton
JONES DAY
51 Louisiana Ave., N.W.
Washington, DC 20001-2113
Telephone: (202) 879-3749
Facsimile: (202) 626-1700
meaton@jonesday.com
Counsel to the City of Detroit, Michigan

/s/ Robert A. Weisberg

Joseph M. Fischer (P13452)
Robert A. Weisberg (P26698)
CARSON FISCHER, PLC
4111 Andover Road, West-2nd Floor
Bloomfield Hills, MI 48302
Telephone: (248) 644-4840
Facsimile: (248) 644-1832
jfischer@carsonfischer.com

rweisberg@carsonfischer.com

and

J. David Garcia (P60194) Jaye Quadrozzi (P71646) YOUNG & ASSOCIATES 27725 Stansbury Blvd., Suite 125 Farmington Hills, MI 48334 Telephone: (248) 353-8620

Facsimile: (248) 479-7828 garcia@youngpc.com

<u>quadrozzi@youngpc.com</u> Counsel for Oakland County, Michigan

Exhibit A

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

-----x

In re:

Case No. 13-53846 (SWR)

CITY OF DETROIT, MICHIGAN, : Chapter 9

Hon. Steven W. Rhodes

Debtor. :

-----x

ORDER CONCERNING THE DEADLINE FOR OAKLAND COUNTY, MICHIGAN TO SERVE COPIES OF CERTAIN REBUTTAL EXPERT REPORTS

This matter having come to the Court upon the stipulation of the City of Detroit, Michigan and Oakland County, Michigan ("Oakland County"), and the Court being otherwise duly advised in the premises;

NOW, THEREFORE, IT IS ORDERED that the deadline for Oakland County to serve copies of rebuttal expert reports regarding pensions shall be extended to **July 29**, **2014.** This Order pertains to one expert from Oakland County. Except as otherwise extended by separate order of the Court, all other deadlines in the *Fifth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor's Plan of Adjustment* [Docket No. 5259] shall remain the same.